

ALABAMA PUBLIC SERVICE COMMISSION

COUNTY OF Georgia
STATE OF Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared A. WAYNE GRAY, who being by me first duly sworn depose and said that he/she is appearing as a witness on behalf of BellSouth Telecommunications, Inc. before the Alabama Public Service Commission in Docket No. 29054, IN RE: Implementation of the Federal Communications Commission's Triennial Review Order (Phase II - Local Switching for Mass Market Customers), and if present before the Commission and duly sworn, his/her statements would be set forth in the annexed direct testimony consisting of 6 pages and 0 exhibits.

A. Wayne Gray

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 19th DAY OF JANUARY, 2004



Linda M. Hobbs Notary Public

Notary Public, Gwinnett County, Georgia
My Commission Expires March 17, 2007

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF A. WAYNE GRAY
3 BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 29054 (PHASE II)
5 JANUARY 20, 2004
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR
9 BUSINESS ADDRESS.
10

11 A. My name is A. Wayne Gray. My business address is 675 West Peachtree
12 Street, Atlanta, Georgia 30375. My title is Director – Regional Planning and
13 Engineering Center in the Network Planning and Support organization.
14

15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
16 AND EXPERIENCE.
17

18 A. I graduated from Georgia Tech in 1979, with a Bachelor of Electrical
19 Engineering degree. In 1992, I received a Master of Business Administration
20 degree from Emory University. I began working for Southern Bell in 1979, in
21 the Equipment Engineering organization in Miami, Florida. Over the course of
22 my 24- year career with BellSouth, I have held various line and staff positions
23 in Equipment Engineering, Traffic Engineering (Capacity Management),
24 Infrastructure Planning, and Project Management. In November 1999, I
25 became Director-Collocation in the Network Planning and Support

1 organization. In December 2001, my scope of responsibility was expanded
2 and my title was changed to Director – Regional Planning and Engineering
3 Center. In this position, I am responsible for ensuring that BellSouth
4 provisions collocation arrangements in the timeframes established by
5 contractual agreements and governmental mandates. I am also responsible for
6 managing the planning and engineering of BellSouth’s Advanced Intelligent
7 Network, Common Channel Signaling Network, Link Monitoring System,
8 Public Packet Switching Network, MemoryCall® Service platform, Pooled
9 Internet Access Platforms, and corporate transport network. My
10 responsibilities also include the activities performed by BellSouth’s
11 Numbering and Technology Forecasting groups. In addition, I direct all switch
12 software upgrades and contract administration for the purchase of network
13 technologies.

14

15 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

16

17 A. My testimony addresses the availability of collocation in BellSouth’s central
18 offices, BellSouth’s performance in provisioning collocation, and the
19 availability of Co-carrier Cross-Connects (“CCXCs”).

20

21 Q. PLEASE DISCUSS THE AVAILABILITY OF COLLOCATION SPACE IN
22 BELL SOUTH’S CENTRAL OFFICES.

23

24 A. Space is available for Competitive Local Exchange Carriers (“CLECs”) to
25 collocate equipment in all of BellSouth’s Alabama central offices. If space

1 was not available, the CLEC would know by viewing the Space Exhaust List
2 located on the following BellSouth website:
3 http://interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91081451
4 [-C.pdf](#)
5

6 Q. ARE THERE ALTERNATIVES TO PHYSICAL COLLOCATION IN THE
7 CENTRAL OFFICE, ASSUMING RARE CIRCUMSTANCES WHERE
8 PHYSICAL COLLOCATION MAY NOT BE AVAILABLE IN THE
9 FUTURE?
10

11 A. Yes. CLECs may elect virtual collocation, or in the event that there is no
12 virtual collocation available in the central office, then the CLECs may request
13 adjacent collocation.
14

15 Q. IS BELLSOUTH PROVIDING PHYSICAL COLLOCATION TO CLECS
16 TODAY?
17

18 A. Yes. CLECs currently lease approximately 20,765 square feet of collocation
19 space within fifty-eight (58) of BellSouth's Alabama central offices.
20

21 Q. DOES BELLSOUTH PROVIDE COLLOCATION SPACE TO CLECS IN A
22 TIMELY MANNER FOLLOWING CLECS' REQUESTS FOR SPACE?
23

24 A. Yes. As Mr. Varner discusses in his testimony, over the past year, BellSouth
25 has achieved outstanding performance in meeting the collocation provisioning

1 intervals established by the Alabama Public Service Commission
2 (“Commission”).
3

4 Q. ARE THERE MEASURES IN PLACE TO ASSURE THAT BELL SOUTH’S
5 LEVEL OF PERFORMANCE REGARDING COLLOCATION DOES NOT
6 DIMINISH?
7

8 A. Yes. This Commission has ordered Performance Measurements that are in
9 place today to monitor BellSouth’s collocation performance, as Mr. Varner
10 explains. Should BellSouth fail to meet certain of these metrics, BellSouth
11 would be subject to penalty payments under the Self Effectuating Enforcement
12 Measurements (“SEEMs”) Plan.
13

14 Q. IS A CLEC’S ABILITY TO OBTAIN COLLOCATION A BARRIER TO
15 CLEC ENTRY IN BELL SOUTH’S MARKETS?
16

17 A. Absolutely not.
18

19 Q. TURNING TO THE ISSUE OF CROSS-CONNECTS, WHAT IS A
20 “COMPETITIVE LEC-TO-COMPETITIVE LEC CROSS-CONNECT”?
21

22 A. A “Competitive LEC-to-Competitive LEC Cross-Connects” is commonly
23 referred to as a Co-Carrier Cross Connect (“CCXC”). A CCXC is a
24 connection between two CLECs’ equipment and/or facilities located within the
25 same BellSouth premises. A CCXC must be provisioned using cabling

1 facilities owned by the ordering carrier that is placed over BellSouth's
2 common cable support structure, unless the CLEC's equipment for facilities
3 are located in contiguous collocation arrangements within the central office.
4 The CLECs must also contract with a BellSouth Certified Supplier to place the
5 cabling facilities for the provision of the CCXC.

6

7 Q. WHY WOULD TWO COLLOCATORS USE CO-CARRIER CROSS-
8 CONNECTS?

9

10 A. There are a couple of potential uses. A CLEC might use CCXCs to share
11 facilities and/or equipment or exchange interstate or interexchange traffic.

12

13 Q. DOES BELL SOUTH PERMIT CO-CARRIER CROSS-CONNECTS
14 TODAY?

15

16 A. Yes, and BellSouth has done so for several years. Today, a CLEC can connect
17 its collocation arrangement to another CLEC's collocation arrangement by
18 enlisting a certified installation vendor from the list of BellSouth Certified
19 Suppliers to place the cabling necessary to make the connections between the
20 two CLECs' arrangements. Beginning in the first quarter 2004, BellSouth will
21 provide another means for CLECs to obtain CCXCs. BellSouth will make
22 CCXCs available pursuant to its FCC No. 1 Tariff, whereby BellSouth (rather
23 than a third-party vendor) will install a CCXC at the collocation demarcation
24 point between the two CLECs.

25

1 Q. ARE THERE CLECS WHO HAVE CO-CARRIER CROSS-CONNECTS IN
2 SERVICE TODAY IN BELL SOUTH'S CENTRAL OFFICES?

3

4 A. Yes. In Alabama, there are approximately 6 CCXC arrangements in
5 BellSouth's central offices.

6

7 Q. IS THE ABILITY OF CLECS TO OBTAIN CO-CARRIER CROSS-
8 CONNECTS IN BELL SOUTH CENTRAL OFFICES ON A TIMELY BASIS
9 A BARRIER TO CLEC ENTRY IN BELL SOUTH'S MARKETS?

10

11 A. Absolutely not.

12

13 Q: PLEASE SUMMARIZE YOUR TESTIMONY.

14

15 A. As my testimony demonstrates, CLECs are not impaired as a result of lack of
16 sufficient collocation space in BellSouth's central offices. Collocation space is
17 available in all BellSouth central offices in Alabama. Should space become
18 exhausted in a central office, other options are available to CLECs. There are
19 also multiple options available to CLECs to obtain CCXCs for the purposes of
20 connecting to other carriers' collocation spaces. BellSouth's continued high
21 level of performance is assured by the presence of SEEMs penalties.

22

23 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

24

25 A. Yes.